

1 THE HONORABLE JOHN C. COUGHENOUR  
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7 UNITED STATES DISTRICT COURT  
 8 WESTERN DISTRICT OF WASHINGTON  
 9 AT SEATTLE

10 TIFFANY HILL, individually and on  
 11 behalf of all persons similarly situated,

12 Plaintiff,

13 v.

14 XEROX BUSINESS SERVICES, LLC, et  
 15 al.,

16 Defendants.

CASE NO. 2:12-cv-00717-JCC

**STIPULATED MOTION TO STAY  
 CASE DEADLINES AND TO STRIKE  
 TRIAL DATE**

NOTED ON MOTION CALENDAR:  
 April 8, 2025

16 Plaintiff Tiffany Hill (“Plaintiff”) and Defendants Xerox Business Services, LLC, et al.  
 17 (“Defendants”) (collectively the “Parties”) jointly move the Court to stay or strike all current  
 18 case deadlines and strike the trial date in this matter. In support of this Stipulated Motion, the  
 19 Parties state the following:

20 1. With the assistance of mediator Retired Judge Paris Kallas, on April 4, 2025,  
 21 the Parties reached an agreement on the materials terms of a class action settlement in this  
 22 matter.

23 2. Because this is a class action, the settlement must be approved by the Court in  
 24 accordance with Federal Rule of Civil Procedure 23(e).

25 3. The Parties need to memorialize their settlement in writing and prepare related  
 26 documents (e.g., notices to the class).

STIPULATED MOTION TO STAY CASE DEADLINES AND TO STRIKE  
 TRIAL DATE - 1  
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K&L GATES LLP  
 925 FOURTH AVENUE, SUITE 2900  
 SEATTLE, WA 98104-1158  
 TELEPHONE: +1 206 623 7580  
 FACSIMILE: +1 206 623 7022

1       4.     The parties anticipate that they can negotiate, complete, and execute the  
 2 settlement and related documents by the first week of May 2025.

3       5.     Plaintiff anticipates filing a motion for preliminary approval of the settlement  
 4 by mid-to-late May 2025.

5       6.     The Parties have various impending pre-trial deadlines as well as deadlines set  
 6 in this Court's Order dated March 21, 2025 (Dkt No. 261) that address matters that are not  
 7 relevant to settlement and will become moot if the Court approves the settlement.

8       7.     The Parties agree that staying all current deadlines and striking the trial date so  
 9 that the Parties and the Court can move forward in the settlement approval process will avoid  
 10 needless cost and burdens on the Parties and the Court. *See, e.g., LCR 26(f)* (parties should  
 11 "promote the just, efficient, ... and economical determination" of actions).

12       8.     For the foregoing reasons, the Parties jointly and respectfully request that the  
 13 Court stay all current deadlines and strike the trial date in this case.

14           IT IS SO STIPULATED THROUGH COUNSEL OF RECORD.

15           Respectfully submitted this 8th day of April 2025.

17           K&L GATES LLP

18           By: /s/ Patrick Madden

19           Patrick M. Madden, WSBA #21356

20           Todd L. Nunn, WSBA #23267

21           925 Fourth Avenue, Suite 2900

22           Seattle, Washington 98104-1158

23           Tel: +1 206 370 6795

24           Fax: +1 206 623 7022

25           Email: patrick.madden@klgates.com

26           todd.nunn@klgates.com

24           *Attorneys for Defendants*

1 TERRELL MARSHALL LAW GROUP PLLC

2 By: /s/ Toby J. Marshall  
3 Toby J. Marshall, WSBA #32726  
4 Email: tmarshall@terrellmarshall.com  
5 936 North 34th Street, Suite 300  
6 Seattle, Washington 98103  
7 Telephone: (206) 816-6603  
8 Facsimile: (206) 319-5450

9 Daniel F. Johnson, WSBA #27848  
10 Email: djohnson@bjtlegal.com  
11 BRESKIN JOHNSON & TOWNSEND, PLLC  
12 1000 Second Avenue, Suite 3670  
13 Seattle, Washington 98104  
14 Telephone: (206) 652-8660  
15 Facsimile: (206) 652-8290

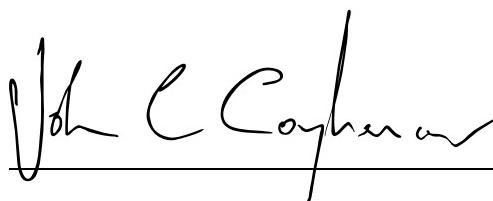
16 *Attorneys for Plaintiff*

17 **PROPOSED ORDER**

18 The Parties have informed the Court that they have reached an agreement on the  
19 materials terms of a class action settlement in this matter. The Parties have thus jointly moved  
20 the Court for an Order staying all current deadlines and striking the trial date in this case.

21 **PURSUANT TO STIPULATION IT IS SO ORDERED.**

22 DATED this 8th day of April 2025.

23   
24 JOHN C. COUGHENOUR  
25 UNITED STATES DISTRICT JUDGE